

# **Exhibit 4**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
3                   WESTERN DIVISION

4                   \_\_\_\_\_  
5                   UNITED STATES OF AMERICA,

6                                   Plaintiff,

7                   vs.

8                   LEONID ISAAKOVICH TEYF,

9                                   Defendant.  
10                   \_\_\_\_\_

)  
 )  
 )  
 )  
 ) Case No.:  
 ) 5:18-CR-00452-FL-1  
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13  
14                   VIDEOTAPED/VIDEOCONFERENCE DEPOSITION OF

15                                   ELENA ZELENNOVA

16                                   TEL AVIV, ISRAEL

17                                   TUESDAY, JANUARY 28, 2020

18                                   1:51 P.M.  
19  
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22  
23  
24

25                   REPORTED BY:   BRENDA MATZOV, CA CSR 9243

12:43:04 1 Q. BY MR. WOLF: Thank you.

13:54:15 2 Ms. Zelenova, where do you live?

13:54:18 3 A. In Moscow.

13:54:19 4 Q. Okay. And have you always lived in

13:54:23 5 Moscow?

13:54:25 6 A. No.

13:54:26 7 Q. Okay. And when you say "Moscow,"

13:54:28 8 are you speaking about Moscow in the country

13:54:30 9 of Russia?

13:54:34 10 A. Yes, of course.

13:54:35 11 Q. Okay. And where else have you lived?

13:54:40 12 A. I lived in Novosibirsk and in Astrakhan.

13:54:46 13 Q. Okay. Novosibirsk, is that another

13:54:49 14 city in Russia?

13:54:52 15 A. Yes.

13:54:52 16 Q. Okay. And Astrakhan, is that also

13:54:55 17 a city in Russia?

13:54:56 18 A. Yes.

13:54:56 19 Q. Okay. So you've -- you've lived your

13:55:00 20 entire life in Russia --

13:55:02 21 A. Yes.

13:55:03 22 Q. -- to date?

13:55:05 23 Thank you. Can you please describe

13:55:08 24 your educational background?

13:55:20 25 A. After school, I graduated from the

13:55:23 1 Novosibirsk State University of Economics and  
13:55:27 2 Management. I studied for five years. And  
13:55:39 3 I qualified as the Master of Commerce.

13:55:43 4 Q. Okay. And if I could just interrupt  
13:55:45 5 you just so there's accuracy.

13:55:47 6 So the name of the school that you  
13:55:50 7 attended for five years, it's called the  
13:55:53 8 Novosibirsk State Academy of Economics and  
13:55:56 9 Management?

13:56:09 10 A. Yes.

13:56:09 11 Q. Okay. And when you attended that  
13:56:13 12 school, did you pay for your tuition?

13:56:26 13 A. No. No. I studied for free because  
13:56:33 14 I participated in a special competition. And  
13:56:37 15 I -- I won the free tuition. And I graduated  
13:56:45 16 with honors.

13:56:46 17 Q. Okay. So when you say "free tuition,"  
13:56:48 18 you received a scholarship, a full scholarship  
13:56:52 19 to that school?

13:56:56 20 A. Yes.

13:56:56 21 Q. Okay. And that school was in Novosibirsk;  
13:56:59 22 correct? Correct?

13:57:03 23 A. Yes.

13:57:03 24 Q. Okay. Is that school also known as --  
13:57:05 25 a reputation as the Harvard of Novosibirsk?

13:57:16 1 A. Yes.

13:57:16 2 Q. Okay. So you attended there for five  
13:57:19 3 years. And then you said you received a Master's  
13:57:21 4 in Commerce with honors; is that correct?

13:57:33 5 A. In -- in Russia it's called a specialist.  
13:57:50 6 But it's equivalent to a Master's degree. It's  
13:57:52 7 not Bachelor's degree. It's Master's degree,  
13:57:55 8 yes.

13:57:57 9 Q. Thank you.

13:57:57 10 Okay. And after they -- you attended  
13:58:02 11 the Novosibirsk State Academy of Economics and  
13:58:06 12 Management, where did you continue your education  
13:58:10 13 next?

13:58:40 14 A. After that, I studied at the Moscow  
13:58:43 15 Institute of Economics and Finance. I studied  
13:58:46 16 there for four years. And when I graduated,  
13:58:48 17 I got a diploma for Master's degree in finance  
13:58:56 18 and --

13:58:58 19 Q. "Credit"?

13:58:58 20 A. -- credit.

13:58:59 21 THE INTERPRETER: "Finance and credit."

13:59:00 22 Q. BY MR. WOLF: Okay. And after receiving  
13:59:07 23 that degree, after four years at the Moscow  
13:59:11 24 Economics and Finance Institute, where did you  
13:59:14 25 continue your education next?

13:59:33 1 A. After that, I studied in -- in the  
13:59:36 2 Moscow Business School. And I received the MBA  
13:59:38 3 degree. I studied two years for that degree.

13:59:42 4 Q. Okay. And after receiving your Master's  
13:59:46 5 of Business Administration, did you continue your  
13:59:51 6 education at another school?

14:00:00 7 A. Yes. Yes. After that, I studied  
14:00:22 8 at the Moscow State Institute of International  
14:00:24 9 Relations. I took courses in corporate finance  
14:00:28 10 and in business protocol and etiquette. I also  
14:00:55 11 studied in Moscow Business School. I took courses  
14:00:58 12 in business planning and budgeting, risk management,  
14:01:02 13 and -- and business operations.

14:01:13 14 Q. Okay. So let me -- if I could, I just  
14:01:16 15 want to go back a little bit.

14:01:17 16 So after you went to the Moscow Business  
14:01:20 17 School and received your Master's in business  
14:01:24 18 administration, the next place that you received  
14:01:29 19 education with was the Moscow Academy of Finance;  
14:01:34 20 is that correct?

14:01:44 21 A. (Comment in Russian.)

14:01:44 22 Q. And that's a -- I'm sorry. Please.

14:01:52 23 A. Yes. That's right. In Moscow Academy  
14:01:54 24 of Finance.

14:01:55 25 Q. And that's a different school than the

14:01:58 1 Moscow Business School; correct?

14:01:59 2 A. No, it's a different place.

14:02:07 3 Q. Okay. And --

14:02:28 4 A. Yes. And I received ACCA diploma

14:02:33 5 there, which is an international certificate

14:02:37 6 on -- on accounting on international level.

14:02:45 7 Q. Okay. Now, that's called ACCA?

14:02:51 8 A. Yes. ACCA.

14:02:52 9 Q. Okay. And that stands for "Association

14:02:56 10 of Certified Chartered Accountants"?

14:03:06 11 A. Yes. That's right.

14:03:07 12 Q. Okay. And what is the purpose of

14:03:09 13 getting an AC -- getting an ACCA certificate

14:03:16 14 for your education?

14:03:58 15 A. In Russia currently, all large companies,

14:04:00 16 those that -- that have IPO, they have to provide

14:04:08 17 their accounting not only on the -- in the local

14:04:12 18 system but in the international system. And

14:04:15 19 this course was supposed to unify the work

14:04:19 20 of the accountants, to harmonize it with the

14:04:22 21 world system, so that the management of the

14:04:24 22 companies would know how to -- how to interpret

14:04:30 23 the accounting system on the international

14:04:32 24 level.

14:04:33 25 Q. Okay. And you used the word -- or

14:04:36 1 the initials "IPO."

14:04:38 2 Are you referring to companies that  
14:04:40 3 are called public companies?

14:04:49 4 A. Yes. That's right. Companies that  
14:04:57 5 have -- that have the right to place their  
14:05:01 6 shares on -- on the trade market.

14:05:06 7 Q. Okay. And companies -- public  
14:05:07 8 companies like in most countries, including  
14:05:11 9 the United States, have certain standards  
14:05:14 10 that they must keep -- accounting standards  
14:05:16 11 that they must keep and certify their financial  
14:05:20 12 records; is that correct?

14:05:22 13 A. Yes. And they must do it in a unified  
14:05:51 14 manner.

14:05:52 15 Q. Thank you.

14:05:53 16 So the Moscow Academy of Finance,  
14:05:59 17 besides getting the ACCA certificate, was there  
14:06:05 18 also a diploma that you received in financial  
14:06:08 19 recording, accounting, and international standards?  
14:06:12 20 Is that separate or the same?

14:06:39 21 A. No. This is the International Academy  
14:06:41 22 of Finance, ACCA.

14:06:43 23 Q. Okay. And after the Moscow Academy  
14:06:48 24 of Finance education, did you continue your  
14:06:55 25 education at another school? And did you --



14:07:04 1 specifically, did you continue your education  
14:07:07 2 in business and economics at another school?

14:07:10 3 MS. KOCHER: Robert, excuse me. Wait.  
14:07:11 4 Robert, I need to ask you all -- you know, we're --  
14:07:18 5 we're on the Internet video and audio where there  
14:07:24 6 is a bit of a delay. And the -- the interpreter  
14:07:30 7 begins interpreting, and you continue to ask or  
14:07:33 8 add another piece. The witness is -- from our  
14:07:35 9 hearing, is beginning to answer before the  
14:07:38 10 translator is fully finished speaking.

14:07:41 11 If you could all just slow down a bit  
14:07:42 12 and make sure to leave time for the transmission  
14:07:44 13 of the audio before the next person speaks, that  
14:07:48 14 would be very helpful.

14:07:49 15 MR. WOLF: Absolutely. We'll do that.  
14:07:49 16 And if for some reason it again occurs, please  
14:07:54 17 let me know. And we'll make sure that we slow  
14:07:56 18 it down again.

14:07:58 19 MS. KOCHER: Thanks.

14:07:59 20 MR. WOLF: You're very welcome. Okay.  
14:08:01 21 So perhaps we can have the last question read  
14:08:05 22 back.

14:08:19 23 (Second part of pending question read  
14:08:19 24 and re-translated.)

14:08:45 25 THE WITNESS: The Moscow State Institute

14:08:47 1 of International Relations, where -- where I  
14:08:53 2 took a course on corporate finance and a course  
14:08:58 3 on business protocol and etiquette.

14:09:05 4 Q. BY MR. WOLF: And the Moscow State  
14:09:07 5 Institute of International Relations, just so  
14:09:11 6 the record is clear -- and I'll be slow because  
14:09:14 7 I want to make sure we don't move too quickly --  
14:09:18 8 is that school also -- that's the name of the  
14:09:23 9 school -- correct? -- Moscow State Institute  
14:09:25 10 of International Relations?

14:09:31 11 A. Yes.

14:09:32 12 Q. Okay. Does it also go by the initials  
14:09:37 13 MGIMO?

14:09:40 14 A. Yes.

14:09:40 15 Q. All right. And does that school also  
14:09:45 16 have a reputation as the Harvard of Russia?

14:09:57 17 A. Definitely.

14:09:57 18 Q. Okay. And, please, if you could  
14:09:59 19 describe the -- your education at that school.

14:10:27 20 A. When I took --

14:10:29 21 THE INTERPRETER: Sorry.

14:10:29 22 MR. WOLF: Please.

14:10:30 23 THE WITNESS: When I took a course  
14:10:31 24 in corporate finance, we were taught by very  
14:10:35 25 famous experts on finance in Russia. So we

14:10:56 1 acquired invaluable experience because those  
14:11:01 2 experts shared their own experience with us.  
14:11:03 3 And we also discussed today's situation in  
14:11:09 4 finance in the entire world.

14:11:12 5 Q. BY MR. WOLF: Okay.

14:11:37 6 A. And as for the course on business  
14:11:39 7 protocol and etiquette, it was about meetings  
14:11:44 8 at the highest level and everything that is  
14:11:48 9 related to participation in such meetings,  
14:11:50 10 from the level of public company to the level  
14:11:53 11 of government. And this course was taught by  
14:12:00 12 diplomats.

14:12:01 13 Q. Okay. Now, the translated English  
14:12:07 14 words of your answer included the words "business  
14:12:10 15 etiquette."

14:12:15 16 Is that referring to business ethics?

14:12:30 17 A. Yes.

14:12:31 18 Q. Okay. So -- okay. Now let's talk  
14:12:42 19 about your employment.

14:12:44 20 Did there come a point in time when  
14:12:46 21 you began working at a company called Delta  
14:12:52 22 Plus?

14:13:04 23 A. Yes.

14:13:04 24 Q. Okay. And was that in 2004?

14:13:08 25 A. Yes.

14:20:42 1 director of finance at Delta Plus, were you the  
14:20:48 2 director of finance of any other companies that  
14:20:51 3 Mr. Teyf owned?

14:21:09 4 A. There were another two companies in  
14:21:11 5 Astrakhan, the Caspian Fish Producing Company.  
14:21:26 6 It was a holding company. And all the assets  
14:21:31 7 that were included in the Delta Plus belonged  
14:21:35 8 to it.

14:21:40 9 And another company, Caspian Fish  
14:21:44 10 Resources, which specifically dealt in fishing  
14:21:58 11 of sturgeon and production of caviar. And  
14:22:09 12 then this company was re-organized and became  
14:22:13 13 another company named Rosskat.

14:22:16 14 So I held the position of financial  
14:22:29 15 director in the three following companies:  
14:22:32 16 Caspian Fishing Production, Delta Plus, and  
14:22:38 17 Rosskat. And Leonid Teyf was the founder of  
14:22:48 18 all of these. And he was also an operating  
14:22:57 19 shareholder and also held a position of the  
14:23:05 20 CEO.

14:23:07 21 Q. Is the CEO also identified by  
14:23:15 22 "general director" as well?

14:23:31 23 A. Correct.

14:23:31 24 Q. Okay. So if I could, just to be  
14:23:36 25 clear, so in addition to Delta Plus, which

14:23:39 1 you've described, there was another company  
14:23:47 2 named Caspian Fish Production Company that  
14:23:57 3 Mr. Teyf owned. And that company owned the  
14:24:05 4 physical assets of Delta Plus, including real  
14:24:11 5 estate, equipment, machinery, and other what  
14:24:19 6 would be called physical assets?  
14:24:22 7 A. Yes.  
14:24:22 8 Q. Okay.  
14:24:22 9 A. That all is correct.  
14:24:42 10 Q. Okay. And as to the company, Caspian  
14:24:46 11 Fish Resources, which later became named Rosskat,  
14:24:57 12 that was actually an operating company?  
14:25:15 13 A. This was a separate entity with its  
14:25:18 14 own assets.  
14:25:19 15 Q. Okay. And those assets, they were  
14:25:22 16 fisheries where there was sturgeon?  
14:25:29 17 A. "Da."  
14:25:29 18 Q. And the sturgeon was processed to  
14:25:33 19 caviar products?  
14:25:42 20 A. "Da."  
14:25:42 21 Q. Okay. And those caviar products --  
14:25:44 22 THE INTERPRETER: "Yes."  
14:25:44 23 Q. BY MR. WOLF: -- were packaged,  
14:25:45 24 were they not?  
14:25:48 25 A. Correct.

14:39:41 1 Q. Okay. So now let me get back to  
14:39:44 2 when Mr. Teyf became the owner of Delta Plus.

14:39:49 3 How much -- how much money did he  
14:39:51 4 invest in Delta Plus to acquire his ownership?

14:39:55 5 A. 5 million U.S. dollars.

14:40:16 6 Q. Okay. And in addition to investing  
14:40:19 7 the \$5 million, did he also provide working  
14:40:25 8 capital for the company as well?

14:40:26 9 A. (Comment in Russian.)

14:40:26 10 Q. And how --

14:40:26 11 THE INTERPRETER: "Correct."

14:40:37 12 Q. BY MR. WOLF: And how much money  
14:40:39 13 did Mr. Teyf put in as working capital to  
14:40:43 14 the company?

14:40:47 15 A. Also 5 million U.S. dollars.

14:40:50 16 Q. Okay. So a total of \$10 million  
14:40:53 17 combined of the investment or ownership  
14:40:56 18 acquisition and working capital; correct?

14:41:06 19 A. Correct.

14:41:06 20 Q. Okay. And at the time that Mr. Teyf  
14:41:09 21 became the owner of Delta Plus, did you understand  
14:41:13 22 that he also had owned or did own other companies?

14:41:33 23 A. Yes. I know that he was owner of other  
14:41:38 24 companies, of other businesses. He was a very  
14:41:41 25 wealthy man.

14:41:43 1 Q. Now, beginning in 2005, on an average  
14:41:54 2 per year, how much money did Mr. Teyf get paid  
14:42:00 3 as profits from the three companies combined,  
14:42:04 4 Delta Plus, Rosskat, and Caspian -- excuse me --  
14:42:11 5 Fish Production Company?

14:42:41 6 A. On the average, around 1.5 million  
14:42:46 7 U.S. dollars.

14:42:47 8 Q. Okay. And in addition to the \$1.5  
14:42:51 9 million every year, did Mr. Teyf also take back  
14:43:01 10 out of the company over time his \$10 million  
14:43:09 11 initial investment and working capital?

14:43:30 12 A. Yes.

14:43:30 13 Q. Okay. And I'm going to give you  
14:43:34 14 a year.

14:43:35 15 By the year 2012, how much of the  
14:43:39 16 \$10 million of investment and working capital  
14:43:44 17 did Mr. Teyf receive back from Delta Plus or  
14:43:51 18 his -- those companies?

14:44:20 19 A. In 2012?

14:44:22 20 Q. Yeah. By 2012.

14:44:28 21 A. Around 7 million.

14:44:30 22 Q. Okay. And by the time the company  
14:44:33 23 closed in 2016, did Mr. Teyf receive the  
14:44:37 24 remaining \$3 million back on his investment  
14:44:40 25 and working capital?

14:44:46 1 A. Yes.

14:44:46 2 Q. Okay. Now, you indicated that, on  
14:44:51 3 average, his annual profit compensation was  
14:44:56 4 a million and a half dollars, \$1.5 million;  
14:45:01 5 correct?

14:45:01 6 A. (Comment in Russian.)

14:45:01 7 Q. Okay.

14:45:01 8 THE INTERPRETER: "Correct."

14:45:10 9 Q. BY MR. WOLF: Did there come a point  
14:45:12 10 in time, directing your attention to the year  
14:45:14 11 2010, when Mr. Teyf became the deputy director  
14:45:19 12 of a company called Voentorg?

14:45:37 13 A. Yes.

14:45:37 14 Q. Okay. And he remained the deputy  
14:45:43 15 director of Voentorg for a couple of years?

14:45:46 16 Is that accurate, more or less?  
14:45:52 17 Whatever you know.

14:45:53 18 A. (Comment in Russian.)

14:45:53 19 Q. Okay.

14:45:55 20 THE INTERPRETER: "Yes."

14:45:56 21 Q. BY MR. WOLF: Okay. And during  
14:45:57 22 the time -- did you ever work for Voentorg?

14:46:02 23 A. No.

14:46:02 24 Q. Okay. In any capacity?

14:46:05 25 A. No.



14:59:36 1 who were working under you as well were involved  
14:59:40 2 in the payroll process, were they not?

14:59:44 3 MS. KOCHER: (Not translated.) Objection  
14:59:44 4 to leading.

14:59:46 5 MR. WOLF: I'll withdraw -- I'll withdraw  
14:59:48 6 the question.

14:59:48 7 THE INTERPRETER: Oh, okay.

14:59:48 8 Q. BY MR. WOLF: Were the accountants that  
14:59:50 9 you described, accountants and economists working  
14:59:53 10 for you, were they involved in the payroll process?

15:00:21 11 A. As for the economists, they had nothing  
15:00:24 12 to do with it. And as for the accountants, there  
15:00:26 13 is one person who is called accountant cashier,  
15:00:30 14 so to speak. And he is the one who has the special  
15:00:34 15 power of attorney to go to the bank to get the  
15:00:39 16 money and to pay the salaries. This is his job.  
15:00:41 17 And that's only one person who does it.

15:00:44 18 Q. Okay. And when the money had to be  
15:00:46 19 transported -- the payroll money had to be  
15:00:49 20 transported from the bank when it was picked  
15:00:53 21 up and brought back to Delta Plus or Rosskat,  
15:00:55 22 was there security needed for that transport?

15:01:29 23 A. Yes. If we're talking -- well, if  
15:01:32 24 we're -- if we were talking about a large sum  
15:01:35 25 of money, then we provided the transportation.

15:01:37 1 And we also asked the chief of guards to accompany  
15:01:42 2 the accountant so that there would be no problems  
15:01:44 3 on the way.

15:01:45 4 Q. Okay. To your knowledge, were there  
15:01:49 5 occasions when Dmitry Strogii assisted in providing  
15:01:54 6 the security when this payroll money had to be  
15:01:58 7 transported from the bank back to Delta Plus?

15:02:16 8 A. Yes. He could participate in that if  
15:02:18 9 it -- if it happened when he was on duty.

15:02:22 10 Q. Okay. And to your recollection, did  
15:02:26 11 he, in fact, participate on occasions and --  
15:02:28 12 and assist in the security when the payroll  
15:02:31 13 money was transported back?

15:02:40 14 A. Yes.

15:02:49 15 Q. Okay. Now, let me ask you: In  
15:02:52 16 addition to the payroll that was made every  
15:02:58 17 month -- or twice a month, I think as you said --  
15:03:00 18 were there periods of time during the year when  
15:03:07 19 there would be shortfalls of monies to -- to  
15:03:11 20 make payroll for the company?

15:03:13 21 A. Yes. That's right.

15:03:31 22 Q. Okay. And when there was shortfalls  
15:03:35 23 of -- of money to make payroll, okay, were  
15:03:41 24 those shortfalls or was that money needed  
15:03:44 25 to make payroll provided from other sources?

15:08:48 1 Q. Okay. Did you ever work in Moscow  
15:08:51 2 for Delta Plus?

15:08:53 3 A. No.

15:08:53 4 Q. Okay. Now, directing your attention --  
15:09:02 5 well, directing your attention to the years  
15:09:05 6 2010 specifically till 2013, as the director  
15:09:20 7 of finance, did you ever record kickback  
15:09:25 8 payments or bribe payments?

15:09:45 9 A. No.

15:09:45 10 Q. Okay. Was -- were there ever --  
15:09:48 11 for any period of time, when you were the  
15:09:53 12 director of finance, the entirety that you  
15:09:55 13 were at Delta Plus, were kickbacks ever  
15:10:00 14 paid by Delta Plus' subcontractors to the  
15:10:06 15 company?

15:10:22 16 A. No.

15:10:22 17 Q. Okay. At any time that you were  
15:10:26 18 director of finance or the entirety of the  
15:10:28 19 time that you were at Delta Plus, were bribe  
15:10:33 20 payments ever made by the company or, to  
15:10:40 21 your knowledge, arranged through you or  
15:10:43 22 the accountants who worked for you?

15:11:02 23 A. No. Never.

15:11:03 24 Q. Did -- bribes or kickbacks, did  
15:11:07 25 that exist while you were at Delta Plus?

15:11:15 1 Did that ever occur?

15:11:26 2 A. No.

15:11:27 3 Q. Okay. Were the accountants who  
15:11:29 4 worked under your supervision, were they  
15:11:32 5 provided cash payments by Dmitry Strogii?

15:11:39 6 (Court reporter clarification.)

15:11:39 7 Q. BY MR. WOLF: Were they provided  
15:11:47 8 cash payments by Dmitry Strogii at any time?

15:12:06 9 A. No. That's out of the question.

15:12:07 10 Q. Okay. So if Dmitry Strogii said  
15:12:13 11 that there were kickbacks that were arranged  
15:12:19 12 from the subcontractors to Delta Plus and  
15:12:27 13 Leonid Teyf and that you kept computer records  
15:12:30 14 of all of those kickback transactions, is that  
15:12:35 15 true or is he lying?

15:13:03 16 A. No. It's not true.

15:13:05 17 MS. KOCHER: (Not translated.) Robert,  
15:13:06 18 I did not hear the second part of your question  
15:13:09 19 once the translator had begun translating.

15:13:12 20 MR. WOLF: (Not translated.) Okay.  
15:13:12 21 I said "or is he lying?"

15:13:14 22 Q. BY MR. WOLF: Or is Dmitry Strogii  
15:13:16 23 lying when he said that the accountant, Elena  
15:13:21 24 Zelenova, kept computer records of all of the  
15:13:24 25 kickback transactions and accounts? Was he

15:13:27 1 lying when he said that?

15:13:29 2 MS. KOCHER: (Not translated.)

15:13:29 3 Objection to form. Objection to form and  
15:13:31 4 speculation.

15:14:00 5 Q. BY MR. WOLF: Did you keep computer  
15:14:02 6 records or any records of kickback transactions  
15:14:10 7 or bribe payments?

15:14:24 8 A. No. It was impossible.

15:14:26 9 Q. Okay. And let me be specific.

15:14:35 10 So did Dmitry Strogii -- well, first  
15:14:38 11 of all, did you ever instruct Dmitry Strogii  
15:14:41 12 to pick up cash payments from anywhere?

15:15:02 13 A. No. Never.

15:15:02 14 Q. Including payroll?

15:15:08 15 A. No.

15:15:08 16 Q. To your knowledge, did Dmitry Strogii  
15:15:10 17 ever pick up cash at any time when he was working  
15:15:13 18 for Delta Plus or otherwise?

15:15:32 19 A. Only when he accompanied our accountant  
15:15:34 20 to the bank.

15:15:40 21 Q. So according to Dmitry Strogii, he would  
15:15:43 22 pick up large sums of cash in either bags or boxes  
15:15:52 23 and take it to different accountants who worked  
15:15:55 24 under your supervision.

15:16:16 25 Did that happen? Is that true?

15:16:18 1 A. No. No, of course not.

15:16:23 2 Q. And did any of the accountants who  
15:16:25 3 worked under your direction ever tell you that  
15:16:31 4 they were provided bags or boxes of cash by  
15:16:39 5 Dmitry Strogii or anyone else?

15:16:58 6 A. No.

15:16:59 7 Q. Is there any truth to that statement  
15:17:01 8 by Dmitry Strogii? Or is it a pure fabrication?

15:17:07 9 MS. KOCHER: (Not translated.)

15:17:07 10 Objection. Calls for speculation.

15:17:13 11 Q. BY MR. WOLF: To your knowledge,  
15:17:14 12 is that statement by Dmitry Strogii based  
15:17:19 13 upon everything --

15:17:20 14 A. (Comment in Russian.)

15:17:20 15 Q. -- that you know which occurred --

15:17:24 16 A. (Comment in Russian.)

15:17:24 17 Q. Listen to my question. Okay.

15:17:27 18 A. Of course it's a lie.

15:17:28 19 Q. Okay. I'll repeat the question again  
15:17:30 20 so there's no objection.

15:17:33 21 To your knowledge, based upon everything  
15:17:35 22 that you know, including what you know about the  
15:17:38 23 accountants who worked under your direction and  
15:17:41 24 supervision, okay, did Dmitry Strogii or anyone  
15:17:45 25 else ever bring money containers, bags or boxes,

15:17:49 1 okay, containing cash -- large sums of cash,  
15:17:54 2 okay, at any time?

15:18:27 3 A. No.

15:18:27 4 Q. Okay. And according to Dmitry Strogii,  
15:18:30 5 you coordinated the activity of all of these  
15:18:33 6 accountants, okay, in receiving these bags  
15:18:38 7 or boxes of cash that were the products of  
15:18:47 8 kickback payments.

15:18:55 9 Is that -- did that ever happen?

15:19:07 10 A. No.

15:19:08 11 Q. Or was it completely made up?

15:19:10 12 A. It is a complete lie.

15:19:15 13 MR. WOLF: All right. If we could  
15:19:19 14 just take a -- I'd like to take a five-minute  
15:19:21 15 break. And I'll either wrap up, or we'll be  
15:19:26 16 finished with our direct examination. Thank  
15:19:28 17 you.

15:19:28 18 THE VIDEOGRAPHER: Going off the  
15:19:28 19 record at 3:19.

15:19:28 20 (Recess from 3:19 p.m. to 3:43 p.m.)

15:43:16 21 THE VIDEOGRAPHER: Back on record  
15:43:17 22 at 3:49 -- 3:43.

15:43:27 23 Q. BY MR. WOLF: Ms. Zelenova, do  
15:43:30 24 you speak a little English and -- speak  
15:43:33 25 and understand a little bit of English?